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U S WEST, Inc.  
Suite 700  
1020 Nineteenth Street, NW  
Washington, DC 20036  
202 429-3138  
FAX 202 296-5157

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY  
**U S WEST**

Lawrence E. Sarjeant  
Vice President -  
Federal Regulatory

DOCKET FILE COPY ORIGINAL

September 13, 1996

**EX PARTE PRESENTATION**

William F. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., Room 222  
Washington, D.C. 20554

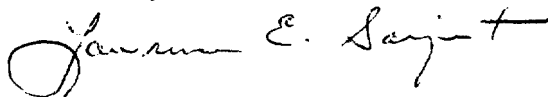
Re: Implementation of the Local Competition Provisions in the  
Telecommunications Act of 1996, CC Docket Nos. 96-98 and 95-185;  
Telephone Number Portability, CC Docket No. 95-116 ✓

Dear Mr. Caton:

On September 12, 1996, Richard D. McCormick, Chairman, CEO and President of U S WEST, Inc.; H. Laird Walker, Senior Vice President, Federal Relations, U S WEST, Inc.; and the undersigned met with Federal Communications Commission Chairman Reed Hundt and Chairman Hundt's Senior Legal Advisor John Nakahata concerning the above-referenced proceedings. In accordance with Commission Rule 1.1206(a)(1), attached please find two copies of written message points that were left with Chairman Hundt and Mr. Nakahata during the meeting that summarize the points presented by U S WEST. The copies of the message points are being filed with your office for inclusion in the public records for the proceedings.

Acknowledgment and date of receipt of this transmittal are requested. A copy is provided for this purpose. Please contact me if you have questions.

Sincerely,



attachments

cc: Chairman Reed E. Hundt  
John Nakahata

## WHAT IS WRONG WITH THE FCC'S INTERCONNECTION ORDER

The order undermines the Act's resale pricing standard (retail less costs avoided) by requiring local telephone companies to rebundle all of the unbundled elements of retail local exchange services and reprice them on the basis of long run incremental costs

The order undermines the Act's preference for negotiated interconnection agreements

The order violates the Act by permitting interexchange carriers that use a RBOC's unbundled elements to jointly market interexchange and local services before the RBOC enters the InterLATA interexchange business

The FCC's interim number portability decision is an unfunded mandate

## IMMEDIATE IMPACTS ON U S WEST

The requirement to unbundle and rebundle retail local exchange services creates tremendous arbitrage opportunities for new entrants with respect to the purchase of retail services and unbundled elements

U S WEST must begin incurring hundreds of millions of dollars in costs in order to comply with number portability, access to operations support systems, provisioning of unbundled elements and other requirements imposed by the FCC's interconnection decisions with virtually no ability to recover its up front costs

The order has placed downward pressure on U S WEST Communications' stock value as analysts gain a better understanding of the onerous interconnection rules imposed on local telephone companies

The order removes the incentive for pursuing negotiated interconnection agreements

## LONG TERM IMPACTS ON U S WEST

The unbundling and rebundling provisions of the order devalue local networks and are a disincentive for telephone company infrastructure investment and the introduction of new technologies

The order places billions in revenues at risk beginning in 1997 and deprives U S WEST of a fair opportunity to recover its costs and be profitable

**The order requires U S WEST to be a construction company for other carriers, constrains its ability to make prudent network investments and creates massive stranded investment exposure**

**WHAT THE FCC SHOULD DO**

**Reverse its decision to deny local telephone companies the opportunity to recover their booked costs in interconnection prices and allow the states to set interconnection prices**

**Require carriers that purchase unbundled elements to interconnect their own loop or switch facilities with the incumbent local telephone company**

**Provide local telephone companies with reasonable and expeditious methods for recovering costs incurred to satisfy interconnection requirements**

**Reverse its decision to require local telephone companies to construct facilities for competitors**

**Grant U S WEST's stay request**